

Osler, Hoskin & Harcourt LLP
Box 50, 1 First Canadian Place
Toronto, Ontario, Canada M5X 1B8
416.362.2111 MAIN
416.862.6666 FACSIMILE

OSLER

Toronto

March 21, 2011

Michael Bowman
Direct Dial: 416-862-6834
mbowman@osler.com
Our Matter Number: 1122444

Montréal

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Calgary

Chair Mark Grimes and Members
Etobicoke York Community Council
Etobicoke Civic Centre
399 The West Mall
TORONTO, ON
M9C 2Y2

New York

Attention: Rosemary MacKenzie - Administrator, Etobicoke York Community Council

Dear Chair Grimes and Members of Community Council:

Public Meeting March 22, 2011; City Initiated Request To Amend the Official Plan, Toronto Zoning By-law 1156-2010, Former York Zoning By-law 1-83, and Former Toronto Zoning By-law 438-86 With Respect to Lands in the Vicinity of St. Clair Avenue West between Scarlett Road and Keele Street/Weston Road (the "Proposed Amendments")

Agenda Item EY5.2

Ward 11, York South-Weston

We are writing on behalf of our client Maple Leaf Foods Inc. ("Maple Leaf") with respect to the above-referenced City initiated Proposed Amendments. On behalf of Maple Leaf, please accept this letter as its objection to the Proposed Amendments to the extent that these will interfere with and undermine Maple Leaf's existing poultry processing operations in the area.

Since 1992, Maple Leaf has operated a large integrated poultry facility at 109 and 99 Ryding Avenue, east of Cobalt Street and south of St. Clair (the "Ryding Poultry Plant"). Maple Leaf's operations at the Ryding Poultry Plant consist of all aspects of poultry production, including slaughter, processing and packing. As recognized in the March 4, 2011 Staff Report (the "Staff Report") Maple Leaf is the largest single employer in the area, currently employing approximately 700 employees. The Ryding Poultry Plant operates 24 hours per day, 7 days per week, and independently-operated trucks carrying both raw materials and finished product require access to the facility on a "round the clock" basis. Although Maple Leaf is in full compliance with certificates of approval that have been issued by the Ministry of the Environment, there are odour, noise and

other emissions associated with its poultry slaughter and processing operations, as well as the ongoing truck traffic to and from the Ryding Poultry Plant.

Maple Leaf has leased both 109 Ryding and 99 Ryding since the early 1990s. Maple Leaf most recently entered into an extension agreement with the owner of 109 Ryding Avenue in April 2010, which allows Maple Leaf to continue its occupation until January 31, 2016, with additional options permitting Maple Leaf to renew until January 31, 2022. The Ryding Poultry Plant is Maple Leaf's major poultry plant servicing Ontario, and Maple Leaf has continued to invest in it. It is Maple Leaf's intention to continue to operate this facility.

Maple Leaf appreciates the objectives of implementing the Avenue Study along the St. Clair Avenue West corridor and the consultative process that has taken place to date. However, Maple Leaf is concerned that the Proposed Amendments, particularly as these apply to lands in the immediate vicinity of the Ryding Poultry Plant, will conflict with and undermine Maple Leaf's existing and permitted uses. In particular, Maple Leaf objects to the proposed redesignation of lands to Mixed Use that will permit the introduction of sensitive residential uses in the vicinity of the Ryding Poultry Plant. The introduction of such uses will create fundamental land use conflicts arising out of Maple Leaf's normal business operations. There will inevitably be complaints from any future residents that will ultimately result in pressures to restrict or eliminate Maple Leaf's legal employment uses. This is not consistent with the stated objective contained in the Staff Report that "every effort should be made to retain this important employer".

Maple Leaf acknowledges that the Proposed Amendments also recommend several site specific policies to prohibit any residential use within 100 metres of a facility that involves the slaughter or rendering of animals or processing them for animal feed. The basis or rationale of this setback requirement is not clear from the Staff Report or the other documents that Maple Leaf has had the opportunity to review. However, it is Maple Leaf's view that this proposed setback is inadequate given the nature of its operations. Given the significance of this fundamental separation distance issue, the Proposed Amendments should not be approved until further study has been done.

It is also inappropriate for the Staff Report to speculate at this time as to whether the Ryding Poultry Plant may be closed as part of a corporate restructuring (as has been done at pages 10 and 22). As stated above, such speculation is in any event unwarranted. However, it appears from the Staff Report that such speculation has in part led to the recommendation to conditionally redesignate lands to permit Mixed Use residential by means of a future zoning by-law amendment, without the need for a future official plan amendment. The appropriate course of action would be to recognize that the Ryding Poultry Plant is an existing and permitted use that will continue into the future and to

ensure that applicable official plan and zoning requirements comprehensively respect this reality.

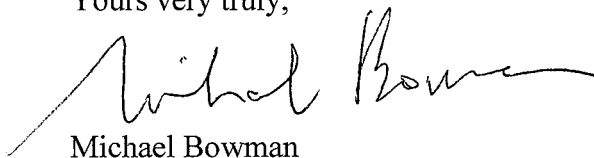
We have also had the opportunity to review the March 16, 2011 letter from Paletta International Corporation. While Maple Leaf has no desire to become engaged in a public dispute with Paletta, it is obliged to take issue with any request or suggestion that residential uses should be permitted in the vicinity of the Ryding Poultry Plant or at 109 Ryding Avenue without the need for a future official plan amendment. Indeed, this position illustrates the danger (or at least prematurity) of those provisions in the Proposed Amendments that purport to immediately redesignate lands to Mixed Use. Such an immediate redesignation will also have the effect of de-stabilizing these existing employment lands by creating additional speculation as to their future.

Please note that the foregoing represent Maple Leaf's preliminary concerns, on the basis of the limited time that it has had to review the Staff Report and the Proposed Amendments. Maple Leaf wishes to maintain a dialogue with the City and other community stakeholders in ensuring that its existing and permitted uses are properly protected in the context of future redevelopment. However, Maple Leaf is not satisfied that the Proposed Amendments will achieve the City's objectives of protecting and maintaining the employment use and function of the Ryding Poultry Plant. Accordingly, Maple Leaf requests that the Proposed Amendments be reconsidered in order to ensure that the Ryding Poultry Plant is properly protected from any future redevelopment. As an alternative, Maple Leaf would request that the Proposed Amendments be deferred in order to permit it an appropriate opportunity to further consult with City staff and other stakeholders.

Please be advised that we will be present at the Public Meeting on March 22, 2011 in order to further elaborate these objections and to answer any questions that members of Community Council may have.

Please ensure that we continue to receive all future notices, recommendations and decisions with respect to the Proposed Amendments.

Yours very truly,



Michael Bowman
MB:nd